

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
ORION HEALTHCORP, INC.	:	Case No. 18-71748 (AST)
CONSTELLATION HEALTHCARE TECHNOLOGIES, INC.	:	Case No. 18-71749 (AST)
NEMS ACQUISITION, LLC	:	Case No. 18-71750 (AST)
NORTHEAST MEDICAL SOLUTIONS, LLC	:	Case No. 18-71751 (AST)
NEMS WEST VIRGINIA, LLC	:	Case No. 18-71752 (AST)
PHYSICIANS PRACTICE PLUS, LLC	:	Case No. 18-71753 (AST)
PHYSICIANS PRACTICE PLUS HOLDINGS, LLC	:	Case No. 18-71754 (AST)
MEDICAL BILLING SERVICES, INC.	:	Case No. 18-71755 (AST)
RAND MEDICAL BILLING, INC.	:	Case No. 18-71756 (AST)
RMI PHYSICIAN SERVICES CORPORATION	:	Case No. 18-71757 (AST)
WESTERN SKIES PRACTICE MANAGEMENT, INC.	:	Case No. 18-71758 (AST)
INTEGRATED PHYSICIAN SOLUTIONS, INC.	:	Case No. 18-71759 (AST)
NYNM ACQUISITION, LLC	:	Case No. 18-71760 (AST)
NORTHSTAR FHA, LLC	:	Case No. 18-71761 (AST)
NORTHSTAR FIRST HEALTH, LLC	:	Case No. 18-71762 (AST)
VACHETTE BUSINESS SERVICES, LTD.	:	Case No. 18-71763 (AST)
MDRX MEDICAL BILLING, LLC	:	Case No. 18-71764 (AST)
VEGA MEDICAL PROFESSIONALS, LLC	:	Case No. 18-71765 (AST)
ALLEGIANCE CONSULTING ASSOCIATES, LLC	:	Case No. 18-71766 (AST)
ALLEGIANCE BILLING & CONSULTING, LLC	:	Case No. 18-71767 (AST)
PHOENIX HEALTH, LLC	:	Case No. 18-71789 (AST)
	:	
Debtors.	:	(Jointly Administered)

**JOINDER OF PEDIATRIC GROUP ASSOCIATES OF MOLINE, ILLINOIS TO
LIMITED OBJECTION AND RESERVATION OF RIGHTS OF PEDIATRIC
ASSOCIATES OF DAYTON, INC. AND CHILDREN'S MEDICAL CENTER, INC.
WITH RESPECT TO THE MOTION OF THE DEBTORS' FOR ENTRY OF
INTERIM AND FINAL ORDERS (I) AUTHORIZING DEBTORS TO (A) OBTAIN
POST PETITION FINANCING PURSUANT TO 11 U.S.C. §§ 105, 361, 362, 364(c),
364(c)(2), 364(c)(3), 364(d)(1) AND 364(e) AND (B) USE CASH COLLATERAL
PURSUANT TO 11 U.S.C. §363, (II) GRANTING ADEQUATE PROTECTION
PURSUANT TO 11 U.S.C. §§ 361, 362, 363, AND 364, AND (III) SCHEDULING FINAL
HEARING PURSUANT TO BANKRUPTCY RULES 4001(b) AND (c)**

Pediatric Group Associates of Moline, Illinois (the “Moline Physician Group”), by and through its undersigned counsel, hereby joins the limited objection and reservation of rights (the “Objection”) [ECF No. 62] filed by Pediatric Associates of Dayton, Inc. (the “Dayton Physician Group”) and Children’s Medical Center, Inc. (the “Middletown Physician Group,” and

with the Dayton Physician Group, the “Objectors” with respect to the *Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Obtain Post Petition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (B) Use Cash Collateral Pursuant to 11 U.S.C. § 363, (II) Granting Adequate Protection Pursuant to 11 U.S.C. §§ 361, 362, 363, and 364, and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rules 4001(b) and (c)* (ECF No. 26) (the “Financing Motion”).

The Moline Physician Group respectfully requests that any final DIP Order contains appropriate language addressing the concerns of the Objectors raised in the Objection, to the same extent that those concerns apply to the interests of the Moline Physician Group.

The Moline Physician Group expressly reserves all of its rights to assert any claims, defenses, remedies, and causes of action. The Moline Physician Group further reserves the right to supplement, amend, or modify this Joinder, to introduce evidence prior to or at any hearing regarding the Financing Motion, and to object to any revised version of the Financing Motion that may be filed, circulated, proposed or presented by the Debtors after the filing of this Joinder.

The Moline Physician Group has been advised by Debtors’ counsel that the Debtors and the DIP Lenders (as defined in the Financing Motion) do no object to the filing of this Joinder.

Dated: April 13, 2018

Respectfully submitted,

/s/ Paul A Rubin

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